

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF VIRGINIA
Harrisonburg**

RLI INSURANCE COMPANY,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 5:18CV00066-MFU-JCH
)	
NEXUS SERVICES, INC.,)	
LIBRE BY NEXUS, INC.,)	
HOMES BY NEXUS, INC.,)	
)	
Defendants.)	
_____)	

RLI'S MOTION FOR CONTEMPT AGAINST THE ENTITIES

Judgment-creditor, RLI Insurance Company ("RLI"), by counsel, hereby moves the Court to hold Nexus Commercial Ventures, LLC, Nexus Properties, LLC, and One Fish, Two Fish, LLC ("the Entities") in contempt for failure to comply with the Court's May 27, 2021 (Dkt. No. 665) and for other related relief, including an award of attorneys' fees and adverse-inference rulings. In support of this Motion, RLI Insurance Company files its Memorandum in Support herewith.

WHEREFORE RLI prays that this Motion for Contempt be granted, that it be awarded its previously requested attorneys' fees and costs related to the Motions to Compel and also any attorneys' fees and costs related to its Motion for Contempt, that adverse-inference rulings be made against the Entities, and for any other such relief as the Court deems appropriate.

Dated: June 11, 2021

RLI INSURANCE COMPANY

/s/ Dustin M. Paul

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CERTIFICATE OF SERVICE

I hereby certify that on Friday, June 11, 2021, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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